

Alexander Bykhovsky
150 S Grand St
Los Angeles CA 90036

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA


Jorge Alejandro Rojas,

Plaintiff,

v.

Alexander Bykhovsky, et al.,

Defendants.

FILED
2025 MAY 29 AM 10:12
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES
BY: 

Case No.: 2:23-cv-02667-AH-KS

Judge: Hon. Anne Hwang

Request
~~MOTION~~

TO SET ASIDE DEFAULT JUDGMENT

TO THE HONORABLE COURT AND ALL PARTIES:

Defendant Alexander Bykhovsky respectfully requests that the Court set aside the default judgment entered on April 30, 2025, under Federal Rule of Civil Procedure 60(b)(1), on the grounds of mistake, inadvertence, and excusable neglect.

BACKGROUND

I was named as a defendant in this action but was never personally served with the Complaint or Summons. I had no notice that a judgment was being sought against me until recently, when I learned about the default judgment from a third party.

I am not a call center operator and did not make or authorize any of the alleged calls. I was not involved in the direct marketing or delivery of the ringless voicemails at issue in this case.

Moreover, I did not profit from the business in question and have limited financial means to respond or defend myself without proper notice.

LEGAL BASIS

Federal Rule of Civil Procedure 60(b)(1) allows a party to seek relief from a final judgment due to mistake, inadvertence, surprise, or excusable neglect. This motion is timely filed within 30 days of discovering the default judgment.

REQUEST FOR RELIEF

I respectfully ask this Court to:

1. Set aside the default judgment entered against me on April 30, 2025.
2. Allow me 21 days from the date of the order to file a responsive pleading.
3. Grant any further relief the Court deems just and proper.

L. _____

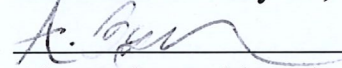
DECLARATION OF ALEXANDER BYKHOVSKY

I, Alexander Bykhovsky, declare as follows:

1. I am the named defendant in this case.
2. I was never personally served with the Complaint or Summons.
3. I had no meaningful involvement in the alleged TCPA violations.
4. I did not manage or operate the business in question.
5. I received no financial benefit from the calls.
6. I only recently learned that a default judgment was entered against me.
7. I am requesting the Court to set aside this judgment so I may properly respond.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on May 29, 2025 at Los Angeles, California.



Alexander Bykhovsky

[REDACTED]

[REDACTED] i- Default Judgment

1. The default judgment entered on April 30, 2025, against Defendant Alexander Bykhovsky is hereby SET ASIDE.
2. Defendant shall have 21 days from the date of this Order to file a responsive pleading.

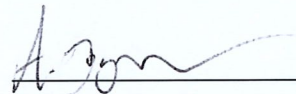
THIS COURT

Honorable Judge

United States District Court

PROOF OF SERVICE

I certify I served this motion on Jorge Rojas via email to rojas.jorge96@gmail.com on May 29, 2025.



Alexander Bykhovsky